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June 8, 2023

**Submitted via ECF**

Honorable Michael A. Hammer, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**RE: Request to Change Scheduling Order  
*Doe v. Rutgers, et al., Civil Action No. 21-20763 (D.N.J.)***

Dear Judge Hammer,

On behalf of Plaintiff Veronica Doe, and with the consent of counsel for Defendant Rutgers University and Scott Strother, we respectfully request a modification to the Amended Scheduling Order (ECF No. 63).

The parties are working in good faith to complete expert discovery. The parties have exchanged all expert reports and have completed the deposition of all of Plaintiff's experts as well as one of Defendants' witnesses. The parties are respectfully requesting additional time to complete the depositions of the remaining defense experts, which will be scheduled and completed in the coming weeks. Accordingly, the parties request that the expert deposition deadline be extended from June 8, 2023, to July 1, 2023. We also would respectfully request a telephonic status conference with the Court on July 12, 2023.

We thank the Court for its consideration of this request. If the Court has any questions for counsel, we are available to respond at the Court's convenience.

*The deadline to complete expert discovery is extended until July 1, 2023. The next telephone conference shall take place*

**SO ORDERED**

**on**

Respectfully Submitted,

*/s/ Michael J. McFarland*

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*Counsel shall dial 1888-684-8852 and enter access code 1456817\* to join the call.*

***s/Michael A. Hammer***

***Michael A. Hammer, U.S.M.J.***

***Date: 6/1/2023***



TRIAL LAWYERS

/s/ Laura L. Dunn, Esq.

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